

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

| | | |
|---------------------|---|------------|
| DIANE RUFF, |) | |
| |) | |
| Complainant |) | |
| |) | Docket No. |
| v. |) | |
| |) | |
| PEOPLES GAS, |) | |
| |) | |
| Respondent |) | |

VERIFIED FORMAL COMPLAINT

Diane Ruff, by and through her attorney Timothy Huizenga, hereby complains of Respondent Peoples Gas, pursuant to 83 Ill. Adm. Code parts 200 and 280, as follows:

1. This complaint is based upon inaccurate billing and improper billing practices by Peoples Gas with respect to the account of Diane Ruffl
2. Ms. Ruff had a residential natural gas account at 6446 S. Maryland, Chicago, IL 60637 ("the subject premises") from April, 2000 until May, 2001.
3. The subject premises consists of a three unit apartment building. Ms. Ruff rented the first floor apartment and had no ownership interest in the subject premises.
4. Ms. Ruff did not receive a bill from Peoples Gas for service at the subject premises until on or about November 9, 2000, though she repeatedly requested a bill during the prior months.
5. The bill she received was an estimated bill in the amount of \$592.83.
6. Ms. Ruff also received an estimated bill from Peoples Gas on or about January 11, 2001 in the amount of \$2,292.06.

7. She received a third estimated bill on or about February 12, 2001 in the amount of \$2,123.10.

8. It is inconceivable that the estimated bills accurately reflect the actual usage in Ms. Ruff's unit during the relevant time periods.

9. Ms. Ruff requested that Peoples Gas perform an actual reading of her meter or adjust the estimated bills on her account due to the unreasonably high amounts billed, all to no avail.

10. Ms. Ruff filed an informal complaint with the ICC, which dismissed her complaint.

11. Subsequent to the dismissal, Ms. Ruff's attorney had a telephone conversation with the ICC employee who sent the dismissal letter about the complaint. The employee told Ms. Ruff's counsel that Peoples Gas had told him that the large bills for Ms. Ruff were due to service at a previous address, which was not known to him, and he suggested that Ms. Ruff's counsel contact Jeff Schaeffer at Peoples Gas.

12. Ms. Ruff's attorney left three phone messages for Mr. Schaeffer, none of which was ever returned.

13. Peoples Gas has violated 83 Ill. Adm. Code 280.80 by failing to make an actual meter reading for Ms. Ruff's account at the subject premises.

14. Peoples Gas has violated 83 Ill. Adm. Code 280.105 by failing to investigate Ms. Ruff's complaint that her bills for service at the subject premises were unreasonably high and for billing Ms. Ruff for amounts in excess of her actual usage.

15. Ms. Ruff has complied with the requirements of 83 Ill. Adm. Code 280.170 by filing an informal complaint with the ICC which contained the requisite information.

WHEREFORE, Ms. Ruff requests the following relief:

A. That Peoples Gas be ordered to investigate her account at the subject premises and determine if she has been billed for any tapped service;

B. That Peoples Gas be ordered to rebill her account at the subject premises and reduce her bill to an amount which equals her actual usage at the subject premises, less all payments and credits.


Attorney for Diane Ruff

Timothy Huizenga
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VERIFICATION

The undersigned certifies that the allegations of fact set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.


Timothy Huizenga

Subscribed and sworn to
before me this 6th day of
February, 2002


Notary Public

